

1 KELLER BENVENUTTI KIM LLP  
2 Tobias S. Keller (#151445)  
(tkeller@kbkllp.com)  
3 Peter J. Benvenutti (#60566)  
(pbenvenutti@kbkllp.com)  
4 Jane Kim (#298192)  
(jkim@kbkllp.com)  
5 650 California Street, Suite 1900  
San Francisco, CA 94108  
6 Tel: 415 496 6723  
Fax: 650 636 9251

7 *Attorneys for Debtors and Reorganized Debtors*

9  
10 **UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

16 **Debtors.**

17  Affects PG&E Corporation  
18  Affects Pacific Gas and Electric Company  
19  Affects both Debtors

20 \* *All papers shall be filed in the Lead Case, No.  
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO TWENTY-FIFTH  
THROUGH FORTY-FIFTH OMNIBUS  
OBJECTIONS TO CLAIMS AND REQUEST  
FOR ORDERS BY DEFAULT AS TO  
UNOPPOSED OBJECTIONS**

[Re: Dkt. Nos. 9418, 9421, 9424, 9427, 9430,  
9433, 9436, 9439, 9441, 9443, 9445, 9447, 9449,  
9451, 9453, 9455, 9458, 9460, 9462, 9464, 9466]

Resolving Objections Set for Hearing  
December 15, 2020 at 10:00 a.m. (Pacific Time)

## **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter orders by default on the following omnibus claims objections (collectively, the “**Omnibus Objections**”):

Docket Number	Omnibus Objection
9418	<i>Reorganized Debtors' Twenty-Fifth Omnibus Objection to Claims (Amended and Superseded Claims)</i> (the <b>"Twenty-Fifth Omnibus Objection"</b> )
9421	<i>Reorganized Debtors' Twenty-Sixth Omnibus Objection to Claims (Duplicative Claims)</i> (the <b>"Twenty-Sixth Omnibus Objection"</b> )
9424	<i>Reorganized Debtors' Twenty-Seventh Omnibus Objection to Claims (Incorrect Debtor Claims)</i> (the <b>"Twenty-Seventh Omnibus Objection"</b> )
9427	<i>Reorganized Debtors' Twenty-Eighth Omnibus Objection to Claims (Books and Records Claims)</i> (the <b>"Twenty-Eighth Omnibus Objection"</b> )
9430	<i>Reorganized Debtors' Twenty-Ninth Omnibus Objection to Claims (Satisfied Claims)</i> (the <b>"Twenty-Ninth Omnibus Objection"</b> )
9433	<i>Reorganized Debtors' Thirtieth Omnibus Objection to Claims (No Liability Claims)</i> (the <b>"Thirtieth Omnibus Objection"</b> )
9436	<i>Reorganized Debtors' Thirty-First Omnibus Objection to Claims (Customer No Liability Claims)</i> (the <b>"Thirty-First Omnibus Objection"</b> )
9439	<i>Reorganized Debtors' Thirty-Second Omnibus Objection to Claims (Customer No Liability Claims)</i> (the <b>"Thirty-Second Omnibus Objection"</b> )
9441	<i>Reorganized Debtors' Thirty-Third Omnibus Objection to Claims (Customer No Liability Claims)</i> (the <b>"Thirty-Third Omnibus Objection"</b> )
9443	<i>Reorganized Debtors' Thirty-Fourth Omnibus Objection to Claims (Customer No Liability Claims)</i> (the <b>"Thirty-Fourth Omnibus Objection"</b> )
9445	<i>Reorganized Debtors' Thirty-Fifth Omnibus Objection to Claims (Customer No Liability Claims)</i> (the <b>"Thirty-Fifth Omnibus Objection"</b> )

Docket Number	Omnibus Objection
	<b>Objection")</b>
9447	<i>Reorganized Debtors' Thirty-Sixth Omnibus Objection to Claims (Customer No Liability Claims)</i> (the " <b>Thirty-Sixth Omnibus Objection</b> ")
9449	<i>Reorganized Debtors' Thirty-Seventh Omnibus Objection to Claims (Customer No Liability Claims)</i> (the " <b>Thirty-Seventh Omnibus Objection</b> ")
9451	<i>Reorganized Debtors' Thirty-Eighth Omnibus Objection to Claims (Customer No Liability Claims)</i> (the " <b>Thirty-Eighth Omnibus Objection</b> ")
9453	<i>Reorganized Debtors' Thirty-Ninth Omnibus Objection to Claims (Customer No Liability Claims)</i> (the " <b>Thirty-Ninth Omnibus Objection</b> ")
9455	<i>Reorganized Debtors' Fortieth Omnibus Objection to Claims (No Liability / Passthrough Claims)</i> (the " <b>Fortieth Omnibus Objection</b> ")
9458	<i>Reorganized Debtors' Forty-First Omnibus Objection to Claims (No Liability / Passthrough Claims)</i> (the " <b>Forty-First Omnibus Objection</b> ")
9460	<i>Reorganized Debtors' Forty-Second Omnibus Objection to Claims (No Liability / Passthrough Claims)</i> (the " <b>Forty-Second Omnibus Objection</b> ")
9462	<i>Reorganized Debtors' Forty-Third Omnibus Objection to Claims (No Liability / Passthrough Claims)</i> (the " <b>Forty-Third Omnibus Objection</b> ")
9464	<i>Reorganized Debtors' Forty-Fourth Omnibus Objection to Claims (No Liability / Passthrough Claims)</i> (the " <b>Forty-Fourth Omnibus Objection</b> ")
9466	<i>Reorganized Debtors' Forty-Fifth Omnibus Objection to Claims (Reduced and Allowed Claims)</i> (the " <b>Forty-Fifth Omnibus Objection</b> ")

## RELIEF REQUESTED IN THE OMNIBUS OBJECTIONS

The Omnibus Objections seek to either (a) disallow and/or expunge or (b) allow in reduced amounts the Proofs of Claim listed in Exhibit 1 to each Omnibus Objection.

## NOTICE AND SERVICE

The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection [Docket Nos. 9420, 9423, 9426, 9429, 9432, 9435, 9438, 9440, 9442, 9444, 9446, 9448, 9450, 9452, 9454, 9457, 9459, 9461, 9463, 9465, and 9468]. The Omnibus Objections also were supported by the respective declarations of Robb McWilliams [Docket Nos. 9419, 9422, 9425, 9428, 9431, 9434, and 9436].

1 9437], and, in the case of the Fortieth through Forty-Fifth Omnibus Objections, the declarations of  
2 Renee Records [Docket Nos. 9456 and 9467]. The Omnibus Objections, the Notices of Hearing, and  
3 the Declarations were served as described in the *Certificate of Service* of Alain B. Francoeur, filed on  
4 November 12, 2020 [Docket No. 9507] (the “**Certificate of Service**”). As further described in the  
5 Certificate of Service, on November 6, 2020, each holder of a claim listed on Exhibit 1 to the Omnibus  
6 Objections received a notice customized to include (i) the claim number, debtor, claim amount and  
7 priority, and the basis for Reorganized Debtors’ objection with respect to the applicable claim to be  
8 disallowed and/or expunged or allowed in a reduced amount, and, if applicable (ii) the claim number,  
9 claim amount and priority of the surviving claim for each counterparty.

10 The deadline to file responses or oppositions to the Omnibus Objections has passed. The  
11 Reorganized Debtors have received the following formal and informal responses:

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
<b>Twenty-Fifth Omnibus Objection</b>			
Informal	WBox 2019-6 LLC	1826	The Reorganized Debtors have reached a settlement of this Claim that resolves the Twenty-Fifth Omnibus Objection.
Informal	WBox 2019-6 LLC	1882	The Reorganized Debtors have reached a settlement of this Claim that resolves the Twenty-Fifth Omnibus Objection.
Informal	Whitebox Caja Blanca Fund, LP	3516	The Reorganized Debtors have reached a settlement of this Claim that resolves the Twenty-Fifth Omnibus Objection.
Informal	WBox 2019-6 LLC	57326	The Reorganized Debtors have reached a settlement of this Claim that resolves the Twenty-Fifth Omnibus Objection.
Informal	WBox 2020-1 LLC	59598	The Reorganized Debtors have reached a settlement of this Claim that resolves the Twenty-Fifth Omnibus Objection.

Docket No.	Claimant	Claim No.	Resolution
Informal	Whitebox GT Fund, LP	60041	The Reorganized Debtors have reached a settlement of this Claim that resolves the Twenty-Fifth Omnibus Objection.
<b>Twenty-Sixth Omnibus Objection</b>			
Informal	C.H. Reynolds Electric, Inc.	58748	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to January 4, 2021. If the objection cannot be resolved, it will be continued to January 12, 2021 at 10:00 a.m.
Informal	WBox 2020-1 LLC	60021	The Reorganized Debtors have reached a settlement of this Claim that resolves the Twenty-Sixth Omnibus Objection.
Informal	WBox 2019-6 LLC	60072	The Reorganized Debtors have reached a settlement of this Claim that resolves the Twenty-Sixth Omnibus Objection.
<b>Twenty-Eighth Omnibus Objection</b>			
Informal	Shafter Solar, LLC	1515	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to March 10, 2021. If the objection cannot be resolved, it will be continued to March 24, 2021 at 10:00 a.m.
Informal	Desert Sunlight 300, LLC	1548	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to March 10, 2021. If the objection cannot be resolved, it will be

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			continued to March 24, 2021 at 10:00 a.m.
Informal	Utility Tree Service, LLC	8068	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to January 15, 2021. If the objection cannot be resolved, it will be continued to January 27, 2021 at 10:00 a.m.
Informal	Siemens Industry, Inc.	60349 64121 64134 78984	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to January 4, 2021. If the objection cannot be resolved, it will be continued to January 12, 2021 at 10:00 a.m.
Informal	Siemens Energy, Inc.	64106	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to January 4, 2021. If the objection cannot be resolved, it will be continued to January 12, 2021 at 10:00 a.m.
Informal	Dresser-Rand	64100	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to January 4, 2021. If the objection cannot be resolved, it will be continued to January 12, 2021 at 10:00 a.m.
9645	Lloyd's Register Quality Assurance, Inc.	9488	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response

Docket No.	Claimant	Claim No.	Resolution
			deadline to January 4, 2021. If the objection cannot be resolved, it will be continued to January 12, 2021 at 10:00 a.m.
Informal	C.H. Reynolds Electric, Inc.	2639 2703 4161	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to January 4, 2021. If the objection cannot be resolved, it will be continued to January 12, 2021 at 10:00 a.m.
Informal	Henkels & McCoy	96925	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to December 14, 2020.
Informal	Mercer US Inc.	3458	The Reorganized Debtors have reached a settlement of this Claim that resolves the Twenty-Eighth Omnibus Objection.
Informal	Oprona Inc.	80261	The Reorganized Debtors have reached a settlement of this Claim that resolves the Twenty-Eighth Omnibus Objection.
<b>Twenty-Ninth Omnibus Objection</b>			
Informal	Westside Solar, LLC	30977	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to March 10, 2021. If the objection cannot be resolved, it will be continued to March 24, 2021 at 10:00 a.m.
Informal	NextEra Energy Montezuma II Wind, LLC	31019	The Reorganized Debtors are attempting to resolve this matter consensually, and

Docket No.	Claimant	Claim No.	Resolution
			have agreed to an extension of Claimant's response deadline to March 10, 2021. If the objection cannot be resolved, it will be continued to March 24, 2021 at 10:00 a.m.
Informal	Siemens Industry, Inc.	64021	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to January 4, 2021. If the objection cannot be resolved, it will be continued to January 12, 2021 at 10:00 a.m.
Informal	Siemens Industry, Inc.	60598	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to January 4, 2021. If the objection cannot be resolved, it will be continued to January 12, 2021 at 10:00 a.m.
<b>Thirtieth Omnibus Objection</b>			
Informal	Michael Magnani	106437	The Thirtieth Omnibus Objection is WITHDRAWN with respect to this Claim.
<b>Thirty-First Omnibus Objection</b>			
Informal	First Baptist Church of Windsor (FBC)	3512	This response was received after the objection deadline has passed, and Claimant has not yet provided the Reorganized Debtors' counsel with information supporting its Claim, despite two requests. Claimant also has not responded to the Reorganized Debtors' two requests to continue the hearing to January 12, 2021. Accordingly, the Reorganized Debtors request that the Thirty-First

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			Omnibus Objection be SUSTAINED with respect to this Claim.
<b>Thirty-Third Omnibus Objection</b>			
Informal	Yair Elor	6906	Claimant's informal response, attached hereto as <b><u>Exhibit 2</u></b> , does not state a cognizable theory of liability. Accordingly, the Reorganized Debtors are prepared to address the Thirtieth Omnibus Objection with respect to this Claim at the hearing.
<b>Thirty-Sixth Omnibus Objection</b>			
9749	Xiang Guang Zhang	6196	The Thirty-Sixth Omnibus Objection is WITHDRAWN with respect to this Claim.
<b>Fortieth Omnibus Objection</b>			
9516	Richard Wagner	1972	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9604	Todd DeGrandmont	2370	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9669	Phil Piserchio	2017	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9530	Bruce Willems	1073	The hearing has been continued to March 24, 2021

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9620	Bret and Cassidy Banducci	2974	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9603	Paul Marotta	1070	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9617	EBEN 818 LLC	3922	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9618	Duncan Ray Ross	2183	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9650	Andrew Etringer	91	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
9647	Alan Giberson	8169	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9656	Robert Ernst	3444	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9643	Valri and Christian Castleman	3063	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9636	Bruce E. Krell	1077	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9646	Todd Greenberg	77335	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9664	Martha Gerstner	3524	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			matter consensually in the meantime.
9668	Frank Klassen	4389	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Helga M. Schmidt	5978	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	James Winter	3576	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Mission Valley Rock Co.	64053	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	D. M. Alegre Construction, Inc.	1292	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Timothy Bergam	133	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			attempting to resolve this matter consensually in the meantime.
Informal	Lance Kastl	3870	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Rhonda Miller	2948	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Joseph C. Loguidice and Stephanie C. Navarrette-Loguidice	16730	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Annette Hicks	9411	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9666	D.A. Wood Construction Inc.	8627	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
<b>Forty-First Omnibus Objection</b>			
9597	H. R. Bob McGrath	67276	The hearing has been continued to March 24, 2021

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9659	Marguerite Sawyer	59635	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9631	Christopher A. Muessel	75887	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Deborah J. & Norman R. Astrin	96351	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Michael Jurkovic	80468	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	State Farm Mutual Insurance Companies (Michael Lane)	8656	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.

Docket No.	Claimant	Claim No.	Resolution
<b>Forty-Second Omnibus Objection</b>			
9634	Mark A. Klein and Janet S. Klein	80500	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9653	G. Larry Engel	80033	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9670	Robert and Marie Villalobos	3784	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Xiaopeng Xu	7723	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
<b>Forty-Third Omnibus Objection</b>			
9648	Darren Eastman	64083	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9628; 9629	Rhonda A. Weiss	72	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9644	Dorcas Wheeler	79932 80179	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9641	Steven J. McDonald	80425	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9658	Kings Canyon Unified School District	3866	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Tandra DeBose	7769	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Linda Grady	1193 80248	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Willie and Ora Green	80673	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time.

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Roger Drummond	1455	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9737	Bruce and Kathleen Shaw	1722	This Response was filed on December 4, 2020, after the objection deadline passed. The Reorganized Debtors' counsel attempted to contact Claimants by email to request a continuance to March 24, 2021, in line with the relief granted in Docket No. 9754, but has not received a response. Accordingly, the Reorganized Debtors request that the hearing be continued.
<b>Forty-Fourth Omnibus Objection</b>			
9649	Dean Wills	75943	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9614	Etta Bacharach Testamentary A & B Trusts	56201	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9661	Ken Bray	70722	The hearing has been continued to March 24, 2021

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9637	Richard S. Tanner	30916	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9638	Stanislaus County Public Works	56952	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9642; 9654	John A. Vos	62490	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9663	Gordon Moore	80903	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9657	Glenn Gary Baker	69361	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
9672	Robert B. Wister	8671	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Tracy Nick and Haisam Nijem	1934	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Todd Field	2206	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	State Farm a/s/o Ava Arroya (T. Henry)	3404	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	University of California	61276	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9766	Linton McNeal	57298	This Response was filed on December 8, 2020, one week after the objection deadline passed. The Reorganized Debtors' counsel attempted to contact Claimant by both telephone

Docket No.	Claimant	Claim No.	Resolution
			and email to request a continuance to March 24, 2021, in line with the relief granted in Docket No. 9754, but was unable to reach him. Accordingly, the Reorganized Debtors request that the hearing be continued.
<b>Forty-Fifth Omnibus Objection</b>			
9600	Jacqueline O'Neil	1685	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9667	Rumi S. Kawashima	934	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9613	Onyx Walker	30795	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9619	Shou Kun Huang and Henry Huang	7920	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9627	Maurice Brendan Butler	8625	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			attempting to resolve this matter consensually in the meantime.
9652	Cynthia Ann Wilson	68287	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
9660 9662	Gordon N. Ball, Inc. (GNB)	4463	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Leonard L Gauthier	10068	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	James Self	10069	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Linda Manzano	9957	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Phil Hartnett	10632	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	John Barnhardt	10083	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Cellan Cahoon	10056	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Alanna McDaniel	10063	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Greg Staude	10059	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Richard Wimmer	10066	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Travelers	59825	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time.

<b>Docket No.</b>	<b>Claimant</b>	<b>Claim No.</b>	<b>Resolution</b>
			Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	State Farm a/s/o Leslie Poortman	3044	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	State Farm Mutual Automobile Insurance Company	58061	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	John I Weaver	2932	The hearing has been continued to March 24, 2021 at 10:00 a.m. Pacific Time. Docket No. 9754. The Reorganized Debtors are attempting to resolve this matter consensually in the meantime.
Informal	Gennadiy Yurkevich	1092 3561	The Reorganized Debtors have reached a settlement of this Claim that resolves the Forty-Fifth Omnibus Objection.
Informal	Williams Mearns	3556	The Reorganized Debtors have reached a settlement of this Claim that resolves the Forty-Fifth Omnibus Objection.

**DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenutti Kim LLP, co-counsel for the Reorganized Debtors

1        2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no  
2 responses have been filed with respect to the Omnibus Objections except as described herein.

3        3. A true and correct copy of the relevant pages of an informal response my office received  
4 to the Thirty-Third Omnibus Objection from Yair Elor (Claim No. 6906) is attached hereto as  
5 **Exhibit 2**.

6        4. This declaration was executed in San Francisco, California.

7        WHEREFORE, the Reorganized Debtors hereby request entry of Orders (1) disallowing and  
8 expunging the Proofs of Claims listed in the column headed "Claims to be Disallowed and Expunged"  
9 in **Exhibit 1** to this Request and (2) allowing in the specified "Reduced Amount" the Claims listed in  
10 **Exhibit 1** to this Request, which listed Claims are identical to those listed in Exhibit 1 to the Omnibus  
11 Objections, except as otherwise discussed above.

12 Dated: December 10, 2020

**KELLER BENVENUTTI KIM LLP**

13 By: /s/ Dara L. Silveira

14 Dara L. Silveira

15 *Attorneys for Debtors and Reorganized Debtors*